

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In re:

**GMS Sunset, LLC.
Debtor.**

Case No. 25-11181-BFK

Chapter 7

TRUSTEE’S APPLICATION TO EMPLOY ATTORNEYS

LAUREN FRIEND MCKELVEY, TRUSTEE, the chapter 7 trustee (the “Trustee”) for the estate of the above-captioned debtor, by proposed counsel, states as follows:

1. The Trustee is the duly qualified and acting Trustee in this case.
2. To perform her duties, the Trustee requires the services of attorneys for the following purposes:
 - a. To assist in preparation of such pleadings, motions, notices, and orders as are required for the orderly administration of the estate and for the sale of any of the assets of this estate, including advising the Trustee on the legal issues related to administration of the debtor’s operations.
 - b. To advise and consult with the Trustee concerning questions arising in the conduct of the administration of the estate and concerning Trustee’s rights and remedies with regard to the estate’s assets and the claims of secured, preferred and unsecured creditors and other parties in interest;
 - c. To appear for, prosecute, defend, and represent the Trustee’s interest in suits

Lauren Friend McKelvey (VSB No. 78813)
David N. Tabakin (VSB No. 82709)
Reitler Kalais & Rosenblatt, LLP
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Proposed Counsel for the Chapter 7 Trustee

arising in or related to this case; and,

d. To assist in such other matters as the Trustee may require.

3. For the foregoing and all other necessary and proper purposes, the Trustee desires to retain generally the law firm of Reitler Kailas & Rosenblatt LLP (“**Reitler**”) as counsel for the Trustee.

4. Because Reitler has experience in bankruptcy, corporate reorganization, and debtor/creditor matters, and because of its particular expertise in chapter 7 trustee representation, the Trustee feels that Reitler is well qualified to render the foregoing services.

5. Based upon the Declaration attached hereto as **Exhibit A**, the Trustee believes that Reitler, and its partners and associates, do not hold or represent any interest adverse to that of the Trustee or the Debtor’s estate and are disinterested persons within the meaning of 11 U.S.C. § 101(14). Further, the Trustee believes that Reitler has no connections with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, except that the Trustee is a partner of Reitler.

6. The Trustee is informed that the normal hourly billing rates of Reitler at the time of this Application range from \$475.00 per hour to \$995.00 per hour for partners and associates and \$395.00 per hour to \$425.00 per hour for para-professionals; such normal hourly billing rates may change from time-to-time. It is contemplated that Reitler will seek compensation based upon normal and usual Reitler billing rates in effect at the time the services are provided, and will seek reimbursement for its expenses, except as follows. Reitler has agreed in this matter to bill time for attorney David N. Tabakin at \$500 per hour (instead of his normal hourly rate of \$650 per hour),

for paralegal Jillian Young at \$300 per hour (instead of her normal hourly rate of \$425 per hour), and for attorney Lauren Friend McKelvey at \$600 per hour (instead of her normal hourly rate of \$850 per hour). Reitler also may seek interim compensation during the case as permitted by 11 U.S.C. § 331.

WHEREFORE, the Trustee prays that the Court entered an order substantially similar to the proposed order attached hereto as **Exhibit B** authorizing her to employ Reitler Kailas & Rosenblatt LLP, generally, as her attorneys to render services in the areas described above with compensation to be paid as an administrative expense in such amounts as this Court may hereafter determine and allow.

LAUREN FRIEND MCKELVEY, TRUSTEE

Dated: October 21, 2025

Respectfully submitted,

/s/ David N. Tabakin

Lauren Friend McKelvey (VSB No. 78813)

David N. Tabakin (VSB No. 82709)

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21st day of October 2025, a true and accurate copy of the foregoing Application was sent via email to the Office of the U.S. Trustee at ustpreion04.ax.ecf@usdoj.gov and via Notice of Electronic Filing to Counsel to Debtor and all registered users in this case pursuant to this Court's CM/ECF policy.

/s/ David N. Tabakin

David N. Tabakin

Exhibit A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
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DECLARATION OF LAUREN FRIEND MCKELVEY

I, Lauren Friend McKelvey, declare:

1. I am an attorney duly admitted to practice before all Courts of the Commonwealth of Virginia, and all federal courts in the Commonwealth of Virginia, including the U.S. Bankruptcy Court for the Eastern District of Virginia (“**Court**”).

2. I am a partner with Reitler Kailas & Rosenblatt LLP (“**Reitler**”), the law firm that the Trustee is seeking to employ generally by the Application to which this Declaration is attached. Certain other attorneys of this law firm are similarly duly admitted to practice in this state and before this Court.

3. The law firm of Reitler Kailas & Rosenblatt LLP has extensive experience in bankruptcy, insolvency, corporate reorganization, and debtor/creditor law, including chapter 7 trustee representation. The firm is well qualified to represent the Trustee generally herein and is willing to accept employment on the basis set forth in the annexed application.

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4. The law firm of Reitler Kailas & Rosenblatt LLP, its partners, and its associates do not hold any interest adverse to the above-entitled estate and said law firm is a disinterested person as defined in 11 U.S.C. § 101(14). Further, said law firm has no connection with the Debtor, creditors, or any other party in interest, their respective attorneys or accountants, except that the Trustee is a partner of Reitler.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of October 2025, at Reston, Virginia.

/s/ Lauren Friend McKelvey
Lauren Friend McKelvey (VBS No. 78813)

Exhibit B

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
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ORDER AUTHORIZING EMPLOYMENT OF ATTORNEYS

The Court having considered the Application of Lauren Friend McKelvey, chapter 7 trustee for the-above Debtor's estate (the "**Trustee**"), to employ attorneys, and the Declaration of Lauren Friend McKelvey in support thereof, and

IT APPEARING that the law firm of Reitler Kailas & Rosenblatt LLP is a disinterested person and does not hold or represent an interest adverse to the estate, and that the employment of the law firm generally by the Trustee is in the best interest of this estate, it is hereby

ORDERED that Lauren Friend McKelvey, chapter 7 trustee, is authorized to employ the law firm of Reitler Kailas & Rosenblatt LLP, generally, as attorneys for the Trustee and the estate, with compensation to be paid in such amounts as may be allowed by the Court upon proper application or applications therefor.

Dated: _____

Brian F. Kenney
United States Bankruptcy Judge

Lauren Friend McKelvey (VSB No. 78813)
David N. Tabakin (VSB No. 82709)
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Proposed Counsel for the Chapter 7 Trustee

I ask for this:

/s/_____
Lauren Friend McKelvey (VSB No. 78813)
David N. Tabakin (VSB No. 82709)
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Proposed Counsel for Chapter 7 Trustee

SEEN:

/s/_____(Permission to affix signature received via email dated //25)
Michael T. Freeman
Office of the United States Trustee
1725 Duke Street, Suite 650
Alexandria, VA 22314
Tel: 703-557-7229
Email: Michael.T.Freeman@usdoj.gov

Local Rule 9022-1(C) Certification

The foregoing Order was endorsed and/or served upon all necessary parties pursuant to Local Bankruptcy Rule 9022-1(C).

/s/_____
David N. Tabakin

Copies to: recipients of electronic notice